

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,

*Plaintiff,*

v.

DONALD J. TRUMP, in his personal capacity,

*Defendant.*

No. 20 Civ. 7311 (LAK)

DECLARATION OF ROBERTA A. KAPLAN IN SUPPORT OF  
PLAINTIFF E. JEAN CARROLL'S MOTION TO AMEND

I, Roberta A. Kaplan, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a member of the bar of the State of New York and am admitted to appear before this Court. I am a partner in the law firm Kaplan Hecker & Fink LLP, counsel for Plaintiff E. Jean Carroll in the above-captioned action.

2. I respectfully submit this declaration in support of Carroll's motion to amend.

3. Attached hereto as **Exhibit A** is a true and correct copy of Carroll's proposed Amended Complaint.

4. Attached hereto as **Exhibit B** is a true and correct copy of a comparison in redline between Carroll's proposed Amended Complaint and Carroll's original Complaint filed in this action.

Dated: New York, New York  
May 22, 2023

  
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Roberta A. Kaplan